

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
NORTHERN DIVISION

NO. 2:10-CR-8-FL

UNITED STATES OF AMERICA,	)
	) NOTICE OF INITIAL
v.	) DISCOVERY PRODUCTION
	)
GARY JACKSON, et. al.	)

The United States of America, by and through the United States Attorney for the Eastern District of North Carolina, hereby notices its initial, voluntary production of some       thousand pages of production and shows unto the Court the following:

1. The Court has terminated the deadlines established by the initial scheduling order in this matter and set a status conference for June 7, 2010, to discuss the creation of a revised scheduling order.

2. The United States is in receipt of a discovery demand issued by counsel for defendant, Gary Jackson. Local Rule 43.01 of the United States District Court for the Eastern District of North Carolina requires a pretrial discovery conference between the Government and the defense. Pursuant to Local Rule 43.03 and in response to the defendant's demand, the United States has sent, on this date, an initial discovery production consisting of 6310 pages of material. The United States intends to reply to the letter written by counsel for defendant Jackson in more detail once a revised the scheduling order has been established.

3. This initial production constitutes the bulk of the

material which is directly pertinent the pending charges. As the United States hopes to discuss during the June 7, 2010, conference, there is an additional (and likely lesser) quantity of material which is also pertinent to the charges which is still being processed and reviewed. Additionally, there is even a much larger quantity of material, likely exceeding 200,000 pages, collected in the course of the investigation which pertains to topics not directly relevant to the pending charges. The Government intends to subject this material to a review focusing on possible 404(b), Brady and Giglio.

4. The Government recognizes its on-going discovery obligations and by this production hopes to evidence its determination to provide discovery in as comprehensive and rapid a manner is feasible. This initial production should in fact do much

to inform the defendants of the factual background of the charges.

Respectfully submitted this 21st day of May, 2010.

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CERTIFICATE OF SERVICE

A copy of the foregoing is served upon all defendants on this  
21st day of May, 2010, by electronic filing.

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